

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TOU THAO,

Defendant.

MOTION FOR GIGLIO MATERIAL

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves this Court for an Order compelling the Government to disclose the following:

1. Evidence which detracts from the credibility or probative value of testimony or evidence used by the prosecution, including but not limited to:
 - a. Information from any informants directly or indirectly that Mr. Thao was not involved in the offenses as alleged in the indictment;
 - b. Promises of immunity or favorable treatment to any witness for the prosecution;
 - c. Reports, notes or memoranda prepared by or on behalf of any witness reflecting their cooperation with those agencies involved in this indictment;

- d. Any cooperation agreement or the like entered into between any witness and any law enforcement agency (including the Office of the Minnesota Attorney General and the Hennepin County Attorney's Office);
 - e. Any award memo, DEA-103, DEA-356, or any other document relating to any monetary payments or other consideration extended to any witness in this case by any law enforcement agency; and
 - f. A detailed description of any arguable benefit which any witness may have ever received from the United States Attorney's office, or any other law enforcement agency which is in any way associated with the prosecution of this case.
2. Prior contradictory or inconsistent statements of all prosecution witnesses.

This Motion is based on the files, records and proceedings herein, as well as the argument of counsel at the hearing of said Motion.

Respectfully submitted,

Dated: This 3rd day of August, 2021

/s/ Robert M. Paule
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